

ORIGINAL

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

KRISTIN K. MAYES, Chairman
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

2009 DEC 18 P 1:48

AZ CORP COMMISSION
DOCKET CONTROL

PETITION OF TRACFONE WIRELESS INC.
FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER

DOCKET NO. T-20664A-09-0148

MOTION TO INTERVENE

Pursuant to A.A.C. R14-3-105 the Arizona Local Exchange Carriers Association
("ALECA") hereby moves to intervene in the above-captioned case.

I Service

Please serve all documents on:

Craig A. Marks
Craig A. Marks, PLC
10645 N. Tatum Blvd., Ste. 200-676
Phoenix, Arizona 85028
(480) 367-1956 (Direct)
(480) 367-1956 (Fax)
Craig.Marks@azbar.org
Attorney for ALECA

Arizona Corporation Commission

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II Interest in Proceeding

ALECA is comprised of small telephone companies and member-owned cooperatives,
all of which are providing local exchange telecommunications services to customers in rural,
high cost areas of Arizona, and all of which are "rural telephone companies" as defined by the
Communications Act of 1934, as amended (the "Act") 47 U.S.C. 0 153(37). ALECA's members
are:

- Fort Mojave Telephone Company;
- Frontier Communications Corporation;
- Gila River Telecommunications, Inc;
- Hopi Telecommunications, Inc.;

- Midvale Telephone Exchange, Inc.;
- San Carlos Apache Telecommunications Utility, Inc.;
- South Central Communications;
- Table Top Telephone Company, Inc.;
- TDS;
- Tohono O'odham Utility Authority; and
- Valley Telephone Cooperative; and
- Zona Communications.¹

Each ALECA member, including its Tribally-owned members, receives support from the Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each also provides discounted Lifeline telephone service and receives compensation for the discounts from the FUSF. TracFone Wireless, Inc. ("TracFone") seeks designation as an Eligible Telecommunications Carrier (ETC) so that it may provide a Lifeline-like, pre-paid wireless telephone service, which it calls "Safelink," and also receive compensation for doing so from the FUSF. ALECA is concerned that TracFone's Safelink offering may unfairly duplicate the similar offerings of its member companies, cause the FUSF requirements to grow to the point where its member companies' FUSF compensation is endangered, and undermine public support for the FCC's universal service programs.

ALECA reserves the right to take positions on any other issues in this case.

No other party can adequately represent ALECA's interests.

III Requested Relief

ALECA asks that the Commission grant its Motion to Intervene.

¹ Fort Mohave Telecommunications, Gila River Telecommunications, Hopi Telecommunications, San Carlos Apache Telecommunications Utility and the Tohono O'odham Utility Authority are tribally-owned telephone Companies, which are not subject to the jurisdiction of the Arizona Corporation Commission.

1 RESPECTFULLY SUBMITTED on December 18, 2009.
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6 Craig A. Marks
7 Craig A. Marks, PLC
8 10645 N. Tatum Blvd., Ste. 200-676
9 Phoenix, Arizona 85028
10 (480) 367-1956 (Direct)
11 (480) 367-1956 (Fax)
12 Craig.Marks@azbar.org
13 Attorney for Westcor/Globe
14

15 **Original and 13 copies filed**
16 **on December 18, 2009, with:**
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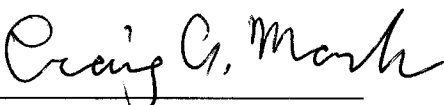
18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007
22

23 **Copy of the foregoing mailed**
24 **on December 18, 2009, to:**
25

26 Maureen Scott, Attorney
27 Legal Division
28 Arizona Corporation Commission
29 1200 W. Washington Street
30 Phoenix, Arizona 85007
31

32 Steve Olea, Director
33 Utilities Division
34 Arizona Corporation Commission
35 1200 W. Washington Street
36 Phoenix, Arizona 85007
37

38 Debra McGuire Mercer
39 Greenberg Traurig, LLP
40 2101 L Street, NW
41 Suite 1000
42 Washington, D.C. 20037
43

44 By: 
45 Craig A. Marks
46